

Hanoud remained free until he was assassinated by Israeli gunships on November 25, 2001, while driving near Nablus.¹²⁸ 30,000 Palestinians marched in his funeral.

A spokesman for the French Foreign Ministry called it a “particularly inappropriate and irresponsible act at a time when parties have been asked to resume dialogue to bring about a ceasefire.”¹²⁹ Predictably, Hamas reprisal attacks followed, breaking the informal ceasefire agreement that had prevented any Hamas suicide bombings inside Israel since September 11th, 2001.¹³⁰

The irony of the situation was described by reporter Hussein Ibish:

The Israeli rhetoric about Arafat has become increasingly incoherent in recent weeks. One day, he is solely responsible for the conflict, the very incarnation of evil. The next day, he is declared ‘irrelevant.’ The day after that, everything depends on his security forces suppressing Hamas and Islamic Jihad, a task Israel could never accomplish even with far more military power.

These are the same Palestinian security forces that Israel’s military has under restricted movement and constant attack. They are routinely bombed by jets or simply captured, disarmed and executed on the spot, as happened to two Palestinian police officers in Salfit on Dec. 14.

In one of the most telling recent ironies, the suicide bomb attacks that killed almost 30 Israelis in Haifa and Jerusalem this month were a direct response to Israel’s assassination of Mahmoud Abu Hanoud, a leading member of Hamas. He had been serving a 12-year sentence in a Palestinian jail, only to escape when Israel bombed the jail in May in one of its attacks on Palestinian police positions.¹³¹

disaster’; Sharon tries to ward off criticism within government, media,” *Baltimore Sun*, May 21, 2001; “The ‘Pimpernel’ of Hamas Delays His Martyrdom Again; Alan Philips in Asira Shamalia on the Fate of an Elusive Militant,” *Daily Telegraph* (London), May 29, 2001.

¹²⁸ “Violence Dents Peace Mission,” *Courier Mail* (Queensland, Australia). November 26, 2001.

¹²⁹ *Ibid.*

¹³⁰ “Twelve Horrific Hours of Death, Mutilation and Terror Take Middle East to Edge of War; Israel Under Attack,” *The Independent* (London), December 3, 2001.

¹³¹ “No More Violence from Israel; No More Violence from Israel, or Silence from U.S.,” *Milwaukee Journal Sentinel* (Wisconsin), December 29, 2001.

Notably, one of the suicide bombers reportedly responsible for the March 21, 2002, incident in the *Sokolow* case, Mahmoud Hashaika, was reportedly motivated by Israel's assassination of Mahmoud Abu Hanoud, an attack which also killed two of Hashaika's cousins.¹³²

Friedrich and Luethold well capture the impact on the Palestinian security sector given Israeli targeting policy during the second uprising:

*With the eruption of the second Intifada, Palestinian security sector governance became much more complicated. Between 2000 and 2002, Israel almost completely destroyed the security infrastructure of the PNA [PA], including police stations barracks, detention centres, vehicles and communications systems, thereby crippling all PNA capacity to uphold law and order in the areas under its control. Non-statutory security actors entered the scene at the same pace at which the PNA's administrative infrastructure disintegrated.*¹³³

Beginning in October 2000, there was a systematic attempt by Israel to degrade PA institutional capacities, and by early 2002, the PA had no systematic command and control capabilities remaining, as their physical infrastructures had been destroyed by Israel. Ariel Sharon's government, elected in early 2001, sought to use the uprising as a pretext to destroy the PLO, the PA and the Palestinian national movement as a whole. Israeli scholar Baruch Kimmerling referred to Sharon's intent to destroy the Palestinian national movement during the intifada as "politicide."¹³⁴

Israel effectively destroyed much of the limited ability of the PA to exercise command and control over its police and security forces early in the intifada. *The Economist* described this demolition of command and control succinctly: "Israel's counter-attack against the intifada (uprising) that broke out in 2000 pulverised the PA's security apparatus and

¹³² "Zinni mission in tatters," *The Weekend Australian*, March 23, 2002 ("The Brigades said the bombing avenged Israeli attacks and killings, and named the bomber as Mohammed Hashaika, at 22. Two of his cousins died last year in an Israeli missile strike that killed a militant leader."); "Israel defends assassination: Palestinians vow revenge," *Calgary Herald (Alberta, Canada)*, November 25, 2001 ("Abu Hanoud, 34, was killed late Friday when an Israeli helicopter fired missiles into a car near the West Bank village of Kfar Farah. Also killed were an aide identified as Mahmoun Rashid Hashaika, and his brother Ahmed.")

¹³³ Roland Friedrich and Arnold Luethold, eds., *Entry-Points to Palestinian Security Sector Reform* (Geneva: DCAF, 2007), p. 18.

¹³⁴ Baruch Kimmerling, *Politicide: Ariel Sharon's War Against the Palestinians* (London and New York: Verso, 2003).

punctured central authority.”¹³⁵ Friedrich and Luethold specifically point to the expansion of the militant capabilities of Hamas, Islamic Jihad, and the new AAMB, as examples of groups able to take advantage of the destruction of the Palestinian security infrastructure.¹³⁶

iii. Targeting of PA Police and Security Personnel

Palestinian policemen legitimately feared for their lives since October 2000 when police and security infrastructure became targets. Despite a large number of police and security force casualties from December 2000 through the intifada, one report quoting IDF soldiers indicates they were told to treat Palestinian police as noncombatants until February 2002, when six IDF soldiers were killed at a checkpoint.¹³⁷ In February 2002, IDF soldiers say the rules were changed and Palestinian police were targeted.

“Brig. Gen. Gershon Yitzhak, commander of the West Bank, said the targeting of the policemen was a justifiable act of war. ‘This shall not be a one-sided war,’ he told reporters at a briefing. ‘We will react toward anyone in any place necessary. The purpose of the operation was to strike at anyone who is in any way ‘involved in the dispatch of terrorists.’”¹³⁸ But the IDF soldiers involved don’t agree. “The soldiers say that the Palestinians they killed had no role in the attack on the soldiers, but were chosen because they were readily available targets, and that the Palestinian officers were mowed down without being given a chance to surrender.”¹³⁹ “Some of them could have been terrorists and some of them could not – we didn’t care, actually,’ Levi said. ‘I felt that I wanted to kill. It smelled like revenge.’”¹⁴⁰

iv. Restrictions on the Movement and Armament of PA Police and Security Forces

¹³⁵ “Hamas Hangs On,” *The Economist*, March 31, 2010, available at <http://www.economist.com/node/15824034>.

¹³⁶ Roland Friedrich and Arnold Luethold, eds., *Entry-Points to Palestinian Security Sector Reform* (Geneva: DCAF, 2007), p. 18.

¹³⁷ Police and security forces were killed by IDF forces in December 2000, February 2001, March 2001, April 2001, May 2001, July 2001, August 2001, September 2001, October 2001, December 2001, and January 2002. See UN Monthly Chronologies.

¹³⁸ Glenn Frankel, “Israelis Recall a Night of Death and Revenge; Ex-Soldiers Decry 2002 Reprisal Killings,” *Washington Post*, June 11, 2005, available at <http://www.washingtonpost.com/wp-dyn/content/article/2005/06/10/AR2005061001900.html>.

¹³⁹ *Ibid.*

¹⁴⁰ *Ibid.*

Palestinian police and security personnel faced severe restrictions on their movements and armaments through most of the Second Intifada. As described in 2010 by a retired U.S. Army Colonel with thirty years' experience in the Middle East, "Starting from the second intifada (2000-2004) and up to the not so distant past, there was little, if any, uniformed Palestinian security presence, even in the PA-controlled (Oslo derived) area A. This was due to Israeli-mandated restrictions on Palestinian security personnel (including on their movement) throughout the West Bank."¹⁴¹

The Israeli policies of closures and curfews during the Second Intifada precluded any effective police functions. "Severe internal closures" prevented pedestrian and vehicle mobility on main roads in the West Bank 73% of the time between September 2000 and March 2002.¹⁴² Partial internal closures rendered the main north-south road in the West Bank inaccessible for the remaining 27% as well.¹⁴³

Curfews, an extreme form of closure in which people were not allowed to leave their homes for extended periods, reached their peak during Operation Defensive Shield in Spring 2002.¹⁴⁴ Curfews severely limited movement of more than a million people for months on end, were often enforced by the IDF using live fire, and effectively halted most police and civilian activity.¹⁴⁵

Various negotiations between the PA and Israel to allow PA police and security personnel to return to duty in specific cities occurred from August 2002 through at least October 2004.¹⁴⁶ The few that reached the

¹⁴¹ Ret. Col. Philip J. Dermer, "Trip Notes on a Return to Israel and the West Bank: Reflections on U.S. Peacemaking, the Security Mission, and What Should Be Done," 39 *Journal of Palestine Studies*, at 66, 70 (Spring 2010), available at <http://www.palestine-studies.org/files/pdf/jps/10706.pdf>.

¹⁴² World Bank, "Fifteen Months – Intifada, Closures and Palestinian Economic Crisis, An Assessment," March 18, 2002, available at www.ochaopt.org/documents/intifada_assess.pdf (at 3).

¹⁴³ *Ibid.*

¹⁴⁴ World Bank, "Four Years – Intifada, Closures and Palestinian Economic Crisis, p. xv, October 2004), available at <http://siteresources.worldbank.org/INTWESTBANKGAZA/Resources/wbgaza-4yrassessment.pdf>.

¹⁴⁵ B'Tselem, *Lethal Curfew: The Use of Live Ammunition to Enforce Curfew*, at p. 8, October 2002, available at www.btselem.org/download/200210_lethal_curfew_eng.pdf.

¹⁴⁶ UN Chronologies for September 2002, October 2002, November 2002, June 2003, July 2003, and January 2004; "Analysis/Sticking With the Gradual Cease-fire Plan – For Now," *Ha'aretz*, August 26, 2002, available at <http://www.haaretz.com/misc/article-print-page/analysis-sticking-with-the-gradual-cease-fire-plan-for-now-1.35863?trailingPath=2.169%2C2.225%2C2.226%2C>; "As Armed Gangs Terrorize PA, Army Considers Letting Palestinian Police Force Resume Armed Patrols," *Ha'aretz*, January 2, 2004, available at <http://www.haaretz.com/misc/article-print-page/as-armed-gangs-terrorize-pa-army->

stage of being implemented were very short-lived and ended within a few months.¹⁴⁷ By Fall of 2004, PA security personnel began carrying weapons again despite the Israeli ban because they feared AAMB militants more than the Israeli reprisals.¹⁴⁸

Even apart from the Israeli closures, curfews, and arms restrictions, the division of the Palestinian territories into Areas A, B, and C made police work a significant challenge. This situation is described by B'Tselem in its 2007 report, "Ground to a Halt: Denial of Palestinians' Freedom of Movement in the West Bank":

*The restrictions on movement make it hard for Palestinian Authority law-enforcement authorities to operate. . . . Under the Oslo Agreements, . . . [Areas A and B], which amount to some forty percent of the West Bank, are comprised of dozens of "islands." Therefore, movement between them requires, almost always, movement through Area C, where Israel continued to have complete control over law enforcement. To the extent that Palestinian police are involved, especially armed police officers, prior coordination is needed with Israeli security forces. Uncoordinated movement brings with it protracted delays at checkpoints and the possible arrest of Palestinian police officers.*¹⁴⁹

Colonel 'Adnan Dainiri, of the Palestinian police in Ramallah, described one example of how this worked in practice:

In cases of violent, armed clashes, as happened, for example, in the area of Bir Zeit, which is only eight kilometers from Ramallah, we submit a request to send a police patrol with armed officers. This happened last summer, when there was an armed clash between families from Abu Shakhidam and Bir Zeit, during which the police station in Bir Zeit

considers-letting-palestinian-police-force-resume-armed-patrols-1.60754?trailingPath=2.169%2C2.225%2C2.226%2C

¹⁴⁷ "PA Cancels Agreement Allowing Its Police to Patrol Jenin," Ha'aretz, January 13, 2003, available at <http://www.haaretz.com/misc/article-print-page/pa-cancels-agreement-allowing-its-police-to-patrol-jenin-1.22381?trailingPath=2.169%2C2.216%2C> ; UN Chronology (Oct. 2003).

¹⁴⁸ "Palestinian Police Carrying Weapons Despite Israel's Ban," Ha'aretz, September 20, 2004, available at <http://www.haaretz.com/misc/article-print-page/palestinian-police-carrying-weapons-despite-israel-s-ban-1.135151?trailingPath=2.169%2C2.225%2C2.226%2C>.

¹⁴⁹ B'Tselem, *Ground to a Halt: Denial of Palestinians' Freedom of Movement in the West Bank*, at 85-86 (2007), available at http://www.btselem.org/download/200708_ground_to_a_halt_eng.pdf

was attacked. When we submitted a request for coordination [with the Israeli authorities] so that we could send a force to the scene to settle the dispute, we received approval the following day. The incident ended in the killing of one young man, the wounding of others, and the torching of a building.¹⁵⁰

b) Israeli Incursions

With the outbreak of the second intifada in September 2000, Israeli forces redeployed into Area A, which was supposed to be under the control of the PA. In addition to their new deployment lines, the IDF undertook near-daily operations into the heart of Area A, Palestinian urban areas in the West Bank as well as similar areas in Gaza. Israel's COIN, or counter insurgency strategy, during the Second Intifada left the PA without continuous effective control in any part of the West Bank and Gaza Strip.

c) Violence Undertaken by Individuals and Groups Outside of PA Control and/or Influence

There was widespread Palestinian raw anger in the aftermath of the failed peace process, which sometimes expressed itself through violence. The violence could be organized by groups or random acts of violence by individual Palestinians. Hamas was a leading source of Palestinian violence throughout the Intifada. For example, according to Israel's Ministry of Foreign Affairs, Hamas committed four major acts of terrorism between June and December 2001 that killed 62 people and injured nearly 500 others.¹⁵¹ During the same period, and especially from the spring of 2001, Arafat unsuccessfully sought a viable means to end the Intifada and decrease violence.

Virtually all attacks against Israeli civilian targets undertaken during the Second Intifada were conducted by factional militia and disorganized local cells and individuals, not by PA forces acting *qua* PA forces. PA security forces, for example, did not carry out suicide attacks on civilians.¹⁵² In a few cases, individuals on the PA security force payroll were alleged to have

¹⁵⁰ *Ibid* at pp. 86-87.

¹⁵¹ "Hamas terrorist attacks," Israel Ministry of Foreign Affairs, March 22, 2004, available at <http://www.mfa.gov.il/MFA/Terrorism-+Obstacle+to+Peace/Terror+Groups/Hamas+terror+attacks+22-Mar-2004.htm>

¹⁵² Efraim Benmelech and Claude Berribe, "Human Capital and the Productivity of Suicide Bombers," *Journal of Economic Perspectives* at 21:3 (Summer 2007).

undertaken attacks against Israelis. A large number of security force employees, though technically still on the payroll, stopped reporting for duty during the Second Intifada and some took up resistance activities on their own behalf.

At the beginning of the Oslo process and following the end of the first intifada, "the intifada's semi-independent nationalist fighters, including Fatah's Black Panthers and the Fatah Hawks, were neutralized, at least in the short term, through co-optation into the new security apparatus."¹⁵³ It stands to reason that some former militants who had been incorporated into the police and security forces would revert to their old militant ways in the context of the Second Intifada uprising, particularly once Israel began targeting police and security service infrastructure and personnel

Oslo was meant to create a 'post-conflict' structure in which, as is the standard practice, militants are coopted to accept peace through their inclusion in police and security forces.¹⁵⁴ The US did much the same thing in ending the Sunni insurrection in Iraq in 2007 by promising to integrate those militants into the Iraqi military. However, neither Oslo nor the US involvement in Iraq really ended the basic conflict, and thus there has been a reversion in both cases back to militancy by some people who had been previously integrated into uniformed forces. In the case of the Palestinians, the reversion back to militancy started with the Second Intifada, and in the case of Iraq, the reversion to militancy accelerated after the US departure from the country.

One must conclude that the alleged participation by some PA personnel in attacks on Israeli targets during the Second Intifada was linked to the degradation of the PA security sector infrastructure and reflects a lack of control by the PA rather than actions taken under PA control.

¹⁵³ Nigel Parsons, *The Politics of the Palestinian Authority*, p. 93 (2005).

¹⁵⁴ United Nations Security Council, "The Role of United Nations Peacekeeping in Disarmament, Demobilization and Reintegration; Report of the Secretary General," S/2000/101, February 11, 2000 (demobilization "may be followed by recruitment into a new, unified military force". "Reintegration refers to the process which allows ex-combatants and their families to adapt, economically and socially, to productive civilian life. It generally entails the provision of a package of cash or in-kind compensation, training, and job- and income-generating projects."); Mark Knight, "Security Sector Reform: Post-conflict Integration," Commissioned by the Global Facilitation Network for Security Sector Reform, August 2009, available at <http://www.ssrnetwork.net/documents/Publications/MarkKnight%20-%20SSR%20-%20Post-conflict%20integration/SSR%20-%20Post%20Conflict%20Integration.pdf>; Alison Laporte-Oshiro, "From Militants to Policemen: Three Lessons from U.S. Experience with DDR and SSR," U.S. Institute of Peace, November 17, 2011, available at <http://www.usip.org/sites/default/files/resources/PB115.pdf>.

Fighters from Hamas and the Palestinian Islamic Jihad (PIJ) acted independent of any PA or PLO control. Moreover, Israeli assassinations of field commanders of these and other various groups tended to free up local cells to undertake violent acts autonomously, leading to higher levels of disorganized violence.¹⁵⁵

The lack of command and control over militant cells by the PA was demonstrated in the April 2001 attempt by Arafat to ban the Popular Resistance Committees (PRC), which were an amalgamation of Palestinian fighters from different groups who banded together to defend Gaza against Israeli incursions. The Palestinian Security Council's decision was openly rejected by PRC members in Gaza. One PRC member phrased it this way: "No one has the right to stop me from defending myself. We are defending our people."¹⁵⁶ In October 2001, Arafat and the Palestinian Security Council once again banned the PRC and several other militant groups, including the military wing of the PFLP.¹⁵⁷ These bans were generally rejected or ignored by the militant groups, further demonstrating the PA's lack of control in the West Bank and Gaza Strip. Militants with superior firepower were often able to resist arrest by PA forces, particularly in militant strongholds.

d) Clans

Palestinian clans often formed their own armed militias during the intifada in order to protect clan members and their interests. Sometimes the clan militias would take on grandiose names but would always be, at core, a clan militia. Clan militias undertook significant acts of violence, although often it was of an intra-Palestinian nature. Clans were outside of the control of the PLO, PA, Fatah or any other political grouping.

In addition to this security function, clans and other extended familial units provide many other valuable 'services' to individuals, particularly those in more traditional societies such as with the Palestinians. Most Palestinian marriages occur within the familial structure (typically to first cousins), employment patterns closely follow clan and family ties, and social life in general is typically enjoyed within the extended family. A man's honor is closely linked to the manner in which he treats his fellow clan members.

¹⁵⁵ Anne Marie Baylouny, "Fragmented Space and Violence in Palestine," *International Journal of World Peace*, Vol. 26, No. 3 (September 2009).

¹⁵⁶ "Security Tightens in Gaza, Unrest Divides Communities," *CNN*, April 29, 2001.

¹⁵⁷ "Arafat Bans Armed Groups," *United Press International*, October 21, 2001.

Rudeness to a member of one's extended family unit through the denial of hospitality, for example, would be seen as a mark of dishonor.¹⁵⁸

e) Limited Effect of Efforts by the PA and Others to Co-Opt AAMB Militants During the Second Intifada.

Palestinian leaders tried a number of methods to neutralize and gain control over the actions of the Al Aqsa Martyrs Brigades to prevent them from engaging in destabilizing attacks on civilians. Israel's preferred method of mass arrests and imprisonment of anyone associated with AAMB, Hamas, or any number of other organizations, was completely infeasible for the weak PA. In any event, Israel's longstanding use of this method had proven to be misguided, as it only led to greater rage and violence among the Palestinian population. Instead, Palestinian leaders tended to take an approach similar to those used in post-conflict state-building exercises.

In post-conflict state-building, the United Nations advocates the disarmament, demobilization, and reintegration (DDR) of former militants. The UN Secretary General defined the demobilization and reintegration steps as follows:

Demobilization refers to the process by which parties to a conflict begin to disband their military structures and combatants begin the transformation into civilian life. It generally entails registration of former combatants; some kind of assistance to enable them to meet their immediate basic needs It may be followed by recruitment into a new, unified military force.

Reintegration refers to the process which allows ex-combatants and their families to adapt, economically and socially, to productive civilian life. It generally entails the provision of a package of cash or in-kind compensation, training, and job- and income-generating projects.¹⁵⁹

The PA was at a disadvantage compared to most post-conflict state-building situations as the Oslo process never created the post-conflict situation that had been envisioned by the Palestinians. Instead of ending the

¹⁵⁸ See Glenn E. Robinson, "Palestinian Tribes, Clans and Notable Families" in *Strategic Insights*, at 7:4, September 2008.

¹⁵⁹ United Nations Security Council, "The Role of United Nations Peacekeeping in Disarmament, Demobilization and Reintegration; Report of the Secretary General." S/2000/101 (Feb. 11, 2000).

Occupation, settlements and the number of settlers grew at a fast pace, more highways (off-limits to Palestinians) were built, farm lands were bulldozed, and freedom of movement became further restricted. Jeff Halper calls this Israel's "Matrix of Control."¹⁶⁰ As an interim governmental entity with little hope for statehood by the Fall of 2000, the PA also lacked the necessary legitimacy to be able to negotiate a ceasefire with the armed factions. The PA's legitimacy was entirely dependent on its ability to negotiate concessions with Israel, such as Israel's agreement to stop assassinating Palestinian political leaders, withdraw troops, release prisoners, and ease travel restrictions. Despite moments of hope during political negotiations, these concessions never came. Nevertheless, the PA made many efforts.

III. The PLO Did Not Support Terrorism and Had No Ability to Stop the Violence During the Second Intifada

As explained in Part I of my report, the PLO is an umbrella organization, encompassing most of the Palestinian factions, with the primary exceptions of Hamas and Palestinian Islamic Jihad (PIJ). Although Fatah is the dominant faction within the PLO, Fatah alone cannot speak for the PLO, nor can any other individual faction. The PLO can only make decisions through its representative bodies, the Executive Committee, Central Committee, and Palestine National Council (PNC).¹⁶¹

After creation of the PA through the Oslo Accords in 1993, the role of the PLO became significantly diminished and the vast majority of its funding was redirected to the PA. The PLO did continue to represent the Palestinian people living in the diaspora and in peace negotiations with Israel, and those continuing efforts are referenced in Section IIA, above. The PLO Executive Committee also issued some ceasefire calls, as referenced in Section IIB, above. Thus, as with the PA, the PLO supported a peaceful solution to the conflict and did not support terrorism.

Due to its severely diminished role and capacity after the creation of the PA, the PLO had no ability to stop the violence during the Second Intifada.

IV. Evaluation of Expert Witnesses

I have been asked to provide an evaluation of the professional qualifications (pertaining to this case) and opinions offered by certain of the expert witnesses engaged

¹⁶⁰ Jeff Halper, "The 94 Percent Solution, A Matrix of Control," *Middle East Report*, Vol. 216, Fall 2000, available at <http://www.merip.org/mer/mer216/94-percent-solution>; Jeff Halper, "Dismantling the Matrix of Control," *Middle East Research and Information Project*, September 11, 2009, available at <http://www.merip.org/mero/mero091109>.

¹⁶¹ See Section IB, above.

by the Plaintiffs. Let me begin with offering my judgment about the kinds of criteria necessary to be considered an expert on Palestinian politics from a scholarly vantage point. Since this case hinges on readings of internal Palestinian dynamics, this is the appropriate expertise to evaluate the material involved in the *Sokolow* case. None of what follows should be viewed as detracting from the expertise that Plaintiffs' expert witnesses have in their own fields, but none is viewed in the academic community as a scholarly expert on Palestinian politics.

In my judgment, an academic expert on Palestinian politics must meet five criteria. First, he or she must have the requisite professional education, meaning have earned a PhD in a relevant field of study. A PhD is the *sin qua non* of the Academy as it signals that the holder has mastered proper methodology in his or her field of study. Methodological sophistication is what most distinguishes a holder of a PhD (and especially from top universities) from others who hold an interest in a region.

Second, an expert on Palestinian politics must have carried out regular and sustained fieldwork over time in Palestinian society, in this case, in the West Bank and Gaza Strip. Reading secondary sources from afar is no substitute for serious political ethnography done in and among Palestinians. Only such fieldwork allows a scholar to really learn the nuances and dynamics at work in Palestinian politics. First-rate historians of Palestine can carry out their work in archives in Britain, Jordan, Israel and elsewhere, but those that claim expertise in contemporary Palestinian politics must spend significant research time in Palestine.

Third, an expert on Palestinian politics must have competency in written Arabic in order to be able to judge primary source material directly, and not through someone else's translation. This is particularly true in the *Sokolow* case in order to gauge the accuracy of the translation of the captured ODS documents.

Fourth, an expert on Palestinian politics needs to have published in peer-reviewed journals and in university presses (which also go through a peer review process). Peer review is at the heart of the scientific method, and a scholar who cannot get published in such prestigious journals and presses would not be given much esteem in the field. If one's scholarship cannot pass muster through critical examination of fellow experts, then it likely is of poor quality or simple partisanship, or both.

Fifth, an academic expert on Palestinian politics would likely be a regular participant in professional associations, conferences and workshops, and would be invited to participate on panels at professional gatherings on Palestinian politics. In North America, the primary professional association is the Middle East Studies Association (MESA), which publishes the flagship journal in the field, the *International Journal of Middle East Studies (IJMES)*. Participation in MESA conferences and publications in *IJMES* are a quick way to gauge the level of professional engagement in

the Middle East scholars enjoy. For scholars in the United Kingdom, the equivalent is the British Society for Middle Eastern Studies (BRISMES), and the *British Journal of Middle East Studies*. There are a number of smaller professional, academic forums for the study of Palestinian politics, often associated with universities in the US, Europe and Israel.

With these five criteria in mind, it is my opinion that none of Plaintiffs' expert witnesses is viewed as a scholarly expert on Palestinian politics in the Academy. I was asked to comment on the professional qualifications of Messrs. Addicott, Karsh, Levitt, Marcus, Shrenzel and Eviatar. As to the first criteria – a PhD in a relevant field – only two (Karsh and Levitt) of the six experts hold such a degree. The others hold no PhD in any field, so would not be considered scholarly experts at all.

As to the second criteria of conducting scholarly fieldwork in the West Bank and Gaza, not a single one of the six witnesses I was asked to evaluate qualifies. While it appears most have at least visited the West Bank (not Gaza), it appears none has ever conducted any sort of sustained fieldwork on a research project in the West Bank and Gaza Strip. Such a lack of on-the-ground research in and familiarity with Palestinian society should discount any witness' ability to claim expertise in contemporary Palestinian politics.

As to the third criteria of competency in written Arabic, at least two of the Plaintiff's witnesses (Addicott and Levitt) do not qualify. They (and perhaps others) must rely on translations of Arabic documents, so are in no position to independently assess the accuracy of such translations. Given these experts' reliance on the ODS documents in forming their opinions, the lack of Arabic proficiency is a serious shortcoming.

When it comes to scholarly, peer-reviewed articles and books, Plaintiffs' witnesses also come up short. As far as I can tell, four of these six individuals have never published a scholarly article at all, much less on internal Palestinian politics. A fifth, Dr. Levitt, published a university press book on Hamas, but that book was less about internal Palestinian political dynamics and more about Hamas' various financial dealings. And, as noted, it was not based on fieldwork in the West Bank and Gaza, including interviews with Hamas officials. Dr. Karsh's most noted foray into internal Palestinian politics was a widely panned book on Yasir Arafat (full disclosure: I was one of the academic reviewers who panned Dr. Karsh's book. See Glenn E. Robinson, "Being Yasir Arafat: a Portrait of Palestine's President" in *Foreign Affairs*, November/December 2003).

None of Plaintiffs' expert witnesses appears to spend any time immersed in professional, scholarly organizations pertaining to the Middle East. Not one of these six gentlemen is a current member of the Middle East Studies Association, the premier

scholarly organization of the Middle East in North America (which has members from around the world, as it is the premier global scholarly organization of the Middle East). As Dr. Karsh is a British academic, I expected to find him on the roster of BRISMES experts, but he is not listed. A search of the archives of the flagship *International Journal of Middle East Studies* reveals that five of the six Plaintiffs' expert witnesses have never published an article or even a book review there, with only Dr. Karsh as the exception (but his publications have never been on Palestinian politics). Several of the Plaintiffs' witness are well known on the partisan circuit of some 'think tanks' and related non-academic institutions, but that is simply not the same thing as having scholarly credentials.

In conclusion, of the six criteria I outlined as being essential to claim expertise on Palestinian politics, not one of the six Plaintiffs' witnesses could claim to meet more than three of those criteria. Most scored a 0 or 1 on the six criteria. This is consistent with my experience of studying Palestinian politics over the past 24 years of never seeing any of these gentlemen in scholarly venues pertaining to Palestinian political and social studies.

With respect to the substantive opinions offered by each individual, my reactions are as follows:

- i. **Jeffrey F. Addicott:** Mr. Addicott's opinion contains at least five fundamental errors:
 - He repeatedly makes the foundational mistake of over-simplifying Palestinian internal politics. His portrayal of Yasir Arafat as an all-powerful dictator who could set the Palestinian street buzzing at one moment, and then just as suddenly turn it off, utterly misunderstands the context in which Arafat operated and his profound political weaknesses. Arafat was not a Stalin-like figure who could dictate outcomes. Rather, he was a relatively weak leader who tried to cajole and persuade people to do as he wanted, but with decidedly mixed results. Mr. Addicott's portrayal of Arafat as a dictator fully in control of Palestinian politics and making all the key decisions is a caricature of a much more complex and fluid reality.
 - He portrays the conflict which began in September 2000 as having been unchanged in its dynamics until Arafat died in November 2004. Again, this is a gross distortion of the reality. For example, some Fatah personalities actively called for resistance to IDF occupation forces in the fall of 2000 after the fateful visit to the Haram al-Sharif of Ariel Sharon. But it is clear that by late fall of 2000 and early 2001 Arafat and some other leaders were trying to rein in Palestinian violence, while others opposed

de-escalation. This conflict, like all conflicts, evolved over time, something that Mr. Addicott ignores. A similar evolution can be seen in the relationship between Fatah and the al-Aqsa Martyrs Brigades (AAMB). In the first months of the uprising certain Fatah militants in the West Bank started using the label of AAMB. However, as the conflict evolved, influence of Fatah leaders over AAMB cells seriously weakened, and AAMB cells throughout the West Bank began to act autonomously. Arafat himself declared the AAMB illegal in 2001 but had little capacity to enforce that decision, given the destruction by Israel of the PA's command and control capabilities.

- He fails to appreciate legal, ideological and pragmatic distinctions between various Palestinian groups. In Mr. Addicott's analysis, the PA is synonymous with Fatah, which is synonymous with the AAMB that may also be synonymous with Hamas and the Popular Resistance Committees. It is a case of, essentially, 'they are all the same.' This one-size-fits-all understanding of Palestinian political groupings is misleading and factually erroneous.
 - He ignores clear evidence that Arafat and other leaders (e.g., Mahmud Abbas) attempted to rein in the violence. It was not something that Arafat could just snap his fingers and stop, but his efforts to tamp down the violence, particularly behind the scenes, were clear, especially beginning in early 2001. Israel's destruction early in the al-Aqsa intifada of the PA's command and control systems (both police and security personnel and institutions were targeted), as well as Israel's targeted assassinations left very little central control over peripheral cells and militants.
- ii. **Efraim Karsh:** Mr. Karsh's opinion suffers similar flaws to those described for Mr. Addicott.
- He takes a very ahistorical approach to understanding the past two decades (and more) of Palestinian history. For Karsh, the whole Oslo peace process was a giant conspiracy, planned and executed by Yasir Arafat, to destroy Israel. This discussion ignores professionally accepted history and omits mention of important events. There is no discussion, for example, of the extreme weakness the PLO found itself in following the 1991 Gulf war, the post-war maneuvering by the first Bush administration to generate a peace process (leading to the Madrid Conference of October 1991 and the subsequent Washington talks), or the very real concessions Arafat offered Israel to kick-start the Oslo peace process in 1993. Those concessions included the acceptance of an interim period (previously rejected by the PLO), no change in the status of Jerusalem during an

interim period, no mandatory cessation of settlement activity, no early resolution of the refugee issue, and no promise of ultimate Palestinian statehood. For Karsh, this was all part of a grand conspiracy by a master terrorist. In other words, this is not history but rather an ahistorical and rather partisan and Manichean portrayal of a complex and important period of history. Dr. Karsh has no explanation for how such a Master Conspirator could be so ineffective at the end of the day. For example, if Arafat were such a cunning genius, why did the number of settlers in the West Bank double from 1991 to 2000? Or why did Arafat only ever win control over 20% of the West Bank (Area A) and no control at all over Jerusalem? For someone who manipulated history and Israel so easily in Karsh's rendering, Arafat obviously failed to deliver the goods when it counted. Dr. Karsh's report regrettably reminded me of other great (and false) historical conspiracies, such as FDR supposedly luring the Japanese to bomb Pearl Harbor, or 9-11 "truthers" who argue that the 2001 terror attacks were an inside job organized by the US Government.

- He resorts to partisan language that is not scholarly and predetermines a conclusion. For Karsh, all PLO fighters are simple "terrorists", the second uprising was a "terrorist war", the West Bank is "Judea and Samaria," which in context is making a partisan statement. This phrase is used almost exclusively by supporters of the Israeli settlement enterprise in the West Bank.
- He bases his opinion on unsupported theories. Dr. Karsh argues that the second uprising was "pre-meditated" by Arafat. There is no serious evidence that this is true. There is some evidence that others, in particular Marwan Barghouti, believed a confrontation with Israel was politically necessary after Camp David failed, but there is no serious evidence that Arafat thought this to be true or actively planned for it.
- Like Mr. Addicott, he makes no distinction between various Palestinian groups and entities. He appears to believe they were all the same and were all under the total control of Arafat. Such an argument is not consistent with the realities of internal Palestinian politics.
- Like Mr. Addicott, he has no appreciation that the al-Aqsa Intifada evolved over time and took on different dynamics at different stages, including, importantly, the destruction of (already weak) PA command and control capabilities. Like all conflicts, this one evolved in important ways, but one would not know that by reading Dr. Karsh's portrayal of it.

iii. **Matthew Levitt:** Mr. Levitt's opinion suffers from serious substantive shortcomings, many related to the source material upon which he relies.

- Virtually the whole of Dr. Levitt's report relies on documents provided by the Israel Defense Forces, some of which may have been seized from PA offices in 2002. These documents are not considered reliable by professionals in my field because they were held by the IDF for internal use before any independent scholars could review them. We frankly cannot know which documents are authentic, whether any documents have been forged, or whether exculpatory documents were never released. A number of independent scholars who have reviewed some documents have raised serious doubts about their credibility.¹⁶² I am unaware of any serious scholars writing about the Second Intifada who rely on or even use the ODS documents because of the credibility problem.¹⁶³ Dr. Levitt is well aware of these criticisms and tries to (very briefly) address them, but only does so through further assertion and a couple of anecdotes; this is hardly convincing. Because there is an absence of corroborating evidence in Dr. Levitt's report not linked to these tainted documents, the opinions in his report are not the result of a reliable academic methodology. Moreover, even the documents Dr. Levitt's cites are no longer available on the cited website, so the documents he discusses cannot be reviewed by scholars.¹⁶⁴
- Relying in large part on a few tainted documents, Dr. Levitt maintains that the AAMB and Fatah were one and the same organization from the whole period 2000-2005. In maintaining this position, Dr. Levitt ignores the fact that most analysts, and in most cases US Government reports, disagree. Beginning in late 2000, a number of Fatah militants and others caught up in the Second Intifada began using the AAMB name. However, whatever influence Fatah had over AAMB cells quickly dissipated as disorganized cells emerged and multiplied, and undertook autonomous violent actions without any form of command and control from either Fatah or the PA.

¹⁶² See, for example, Jean-Francoise Legrain, *Les textes: quelle authenticité?* Found at: <http://www.mom.fr/guides/aqsa/aqsa025.htm>. Legrain, a French academic, is widely considered one of the most outstanding scholars of Palestinian politics.

¹⁶³ As an example, a recent study by Strazzari and Tholens on the Palestinian military component of the second intifada – an obvious place to use the ODS documents – does not use the documents at all. See their "Another Nakba: Weapons Availability and the Transformation of the Palestinian National Struggle, 1987–2007" *International Studies Perspectives* 11 (2010).

¹⁶⁴ I personally confirmed with the institution in Israel that runs the website Dr. Levitt's cites from extensively (www.terrorism-info.org) that the ODS documents are no longer available as the IDF took back full possession of them.

- Levitt asserts that the PA itself was involved in terrorist activity and that Arafat maintained “significant control” over PA forces throughout the conflict. But he quotes the May 2002 State Department report that found no convincing evidence that either the PLO or the PA had been involved in violence. Furthermore, as my report has shown, PA command and control over its police and security forces was never very strong, and it essentially collapsed in the early months of the uprising as police stopped reporting for duty and security forces were targeted by Israeli forces. Some police or security forces who had abandoned their official posts instead joined local cells (AAMB, Popular Resistance Committees, Hamas, etc.) to fight what was perceived as Israeli aggression against Palestinians in the West Bank and Gaza Strip. These cells were typically outside the direct control of any central body, and most often undertook actions autonomously, based on local decisions by local actors.

iv. **Itamar Marcus:** It is not clear what opinions Mr. Marcus is offering, aside from simply reproducing incendiary statements without any context. Given Mr. Marcus' history, his opinions should be viewed with great caution.

- Mr. Marcus has no professional qualifications to be considered an expert witness on any of the issues under review in this case. He is not a scholar or neutral analyst. Quite the opposite: through his “Palestinian Media Watch” he has played the role of a high profile propagandist trying to attack Arafat and the Palestinian Authority almost since the moment the PA was established. Marcus nearly single-handedly manufactured the false crisis that Palestinian school textbooks were teaching anti-Semitism and incitement. Several studies – including one commissioned by the US Government – showed this claim to be false and Dr. Nathan Brown (author of one of these studies) said, virtually all of the persistent and false reports of hatred in Palestinian textbooks could be traced back to one person: Itamar Marcus.¹⁶⁵ According to Dr. Brown, Marcus relied on “misleading and tendentious reports” to support his claims of incitement.¹⁶⁶
- Mr. Marcus makes the same set of mistakes and problematic claims as found in the other reports under review, but usually does so more enthusiastically and with less context. As with the others, there is little to no appreciation of the evolution of the conflict, of the differences between various Palestinian groups, and of the constraints on Arafat's

¹⁶⁵ Traubman, “Reports on Palestinian Kids’ Hatred Grossly Exaggerated,” *JWeekly.com*, February 6, 2004, available at: <http://www.jweekly.com/article/full/21668/>

¹⁶⁶ *Ibid.*

power. Mr. Marcus simply selects inflammatory rhetoric by some Palestinians during the second Intifada and presents those statement without any surrounding context, and without any acknowledgement that similar statements could be pulled out of context from the Israelis during the uprising as well.

- v. **Israel Shrenzel:** Mr. Shrenzel appears to rely heavily on classified data to reach his conclusions, which makes evaluation of parts of his report impossible. Those parts that are reviewable exhibit many of the same flaws as detailed with the other individuals.
- Mr. Shrenzel was working for the GSS during the period of all the events he describes (through 2004), so such an apparent reliance on classified data to draw his conclusions would be expected. Data that remains classified cannot be reproduced, so we have no basis on which to confirm or infirm Mr. Shrenzel's conclusions. By definition, that is not scholarship.
 - Data that was collected in a classified manner but has since been made public is similarly problematic as we do not know the sources and methods of its collection. Moreover, we are left without sufficient knowledge of what percentage of the previously-classified information has been declassified and what remains hidden from public view. Thus, we have no way of gauging the reliability of the data upon which Mr. Shrenzel drew his conclusions.
 - Those parts of Mr. Shrenzel's report that do not rely on classified data consist primarily of reading and summarizing documents without any independent professional judgment being exercised. This is consistent with how intelligence agents often operate. However, without independent judgment and expertise being brought to bear on the documents being examined, there is little to which I can professionally respond.
- vi. **Alon Eviatar:** I was originally asked to review the report of Ronni Shaked and later learned Mr. Shaked had been withdrawn as a potential expert. I then reviewed a report that bore Mr. Eviatar's name, but which was virtually identical to Mr. Shaked's report. These circumstances raise obvious questions about who authored Mr. Eviatar's report and whether the views expressed in that report are indeed his own and the result of his review of the facts or simply views dictated to him by others. With that observation, there are significant flaws in the analysis, regardless of its true author.

- Mr. Eviatar's report is a dramatic read, but is woefully short on scholarly rigor. As with Mr. Schrenzel's report, much of the material in Mr. Eviatar's report comes from classified Israeli data, leaving us no way to gauge the reliability of this data or subject it to the usual forms of critical academic scrutiny. As we know from the recent debate in this country, data obtained from torture is not reliable.¹⁶⁷ Israel also has a long history of torturing Palestinian prisoners. The Landau Commission in Israel (1987) allowed for "moderate physical pressure" to be used on Palestinian prisoners, a phrase that provided the legal justification for torture. The Israeli High Court ruled in 1999 that the forms of torture allowed by Landau were, in fact, impermissible, and the use of torture declined substantially. However, there is evidence that torture by Israel did continue, albeit at lower levels. The recent death of Arafat Jaradat while in Israeli custody focused new attention on this issue.¹⁶⁸ The bottom line is that classified data should not be relied upon as authoritative. For data that has been declassified or otherwise released, we cannot rely on its credibility for reasons noted above, and for classified data that has not been released but only seen and represented as true, we should have even less confidence as that material cannot be seen and critically judged by anyone.
- When this report was submitted under Mr. Shaked's name, it contained conclusions allegedly based on Mr. Shaked's interviews with various people. Mr. Eviatar has adopted Mr. Shaked's conclusions, but without having participated in the interviews, and to my knowledge, without having reviewed the unabridged contents of these interviews. That Mr. Eviatar would do so makes one suspicious of the rigor of his review and the legitimacy of his process. As to the underlying accuracy of Mr. Shaked's accounts, we simply do not have sufficient information to make a meaningful evaluation.
- Mr. Eviatar makes a great deal of the allegation that Marwan Barghouti (a top leader of Fatah) and Abdullah Barghouti (of Hamas) shared hospitality, a car ride, and other familial favors. He portrays these things as representing close Fatah-Hamas cooperation on acts of violence, which ignores cultural norms and necessities in the Arab world. Extending favors to members of one's extended family is an important custom in the Arab world and a man's worth is traditionally judged by how he honors these sorts of familial obligations. Mr. Eviatar's willingness to ignore those customs and instead assign a political motive for such acts (and thereby blame the PA for Abdullah

¹⁶⁷ See The Report of The Constitution Project's Task Force on Detainee Treatment (Washington, D.C., 2013) at <http://detaineeetaskforce.org/newsroom/multimedia/>

¹⁶⁸ For example, see <http://www.aljazeera.com/indepth/opinion/2013/02/201322511744515745.html>

Barghouti's violent acts) indicates a willingness to ignore contrary facts and evidence in order to reach a preordained conclusion.

- Mr. Eviatar makes the rather preposterous claim that Hamas could not have undertaken acts of terror without PA/PLO support. In so doing, he necessarily ignores the many acts of violence Hamas undertook prior to 1994 when Israel was in direct control of the West Bank and Gaza. Would Mr. Eviatar suggest that those acts show Israel was supporting Hamas, especially given Israel's advanced military and security technologies at the time? That would be an absurd claim, and yet Mr. Eviatar concludes the weak and new PA could simply shut down Hamas and its failure to do so proves the PA's support for Hamas. This type of conclusory analysis demonstrates the weakness of Mr. Eviatar's scholarship.



Glenn E. Robinson

July 15, 2013

Date

EXHIBIT A



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EMPLOYMENT

Naval Postgraduate School.

Assistant Professor, 1991-1998; Associate Professor, 1998-present

University of California, Berkeley.

Visiting Professor, Center for Middle East Studies, 2007-2008 (on sabbatical)

The RAND Corporation.

Senior Political Scientist, 2003 (on leave).

EDUCATION

University of California, Berkeley.

Ph.D. (1992), *M.A.* (1988), *B.A. With Highest Honors* (1982). Department of Political Science.

SELECTED ACADEMIC HONORS

Letter of Commendation for Excellence in Teaching. NPS, 2001, 1997.

Outstanding Research Achievement Award. NPS, 1997.

Outstanding Graduate Student Instructor. U.C. Berkeley, 1987-88.

Fulbright Scholar. University of Jordan, Amman, Jordan, 1985-86.

Research Grants and Fellowships: I have received numerous research grants and fellowships, including from the Office of the Secretary of Defense, the US Institute of Peace, the Naval Postgraduate School, Social Science Research Council, the Department

of Education, the University of California at Berkeley, the Truman Institute of the Hebrew University of Jerusalem, Yarmouk University in Jordan, and the American University in Cairo. I was an AFS exchange student to Iran in 1978.

TEACHING EXPERIENCE

Naval Postgraduate School (1991-present)

Courses taught include:

- Jihadi Information Strategy
- Political Violence in the Middle East
- The Arab-Israeli Conflict
- Comparative Methods and Research Design
- Theories of Social Revolution
- Rise and Fall (?) of the Nation-state
- Flashpoints: US Foreign Policy Challenges

PUBLICATIONS

Books:

The Battle for the Story: Jihadi Information Strategy, under contract with Stanford University Press, in progress.

Understanding the Middle East, under contract with CQ Press, in progress.

The Arc: A Formal Structure for a Palestinian State (co-author), Santa Monica: RAND, 2005.

Building a Successful Palestinian State (co-author), Santa Monica: RAND, 2005

Helping a Palestinian State Succeed: Key Findings (co-author), Santa Monica: RAND, 2005

Building a Palestinian State: The Incomplete Revolution, Bloomington and Indianapolis: Indiana University Press, 1997. 248 pages. Indiana Series in Arab and Islamic Studies. Published simultaneously in cloth and paperback editions.

Journal Articles:

"The Political Economy of Corruption in Yemen," to be submitted to the *International Journal of Middle East Studies* 2013.

"Emerging Authoritarianism in South Sudan," Carnegie Papers, to be submitted 2013.

"Syria's Long Civil War," in *Current History* 111:749 (December 2012).

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"Israel and the Palestinians: The Bitter Fruits of Hegemonic Peace," *Current History* Vol. 100, No. 642 (January 2001).

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"Authoritarianism with a Palestinian Face," *Current History*, Vol. 97, No. 615 (January 1998).

"The Dilemma Facing Yasser Arafat: An Eroding Political Authority," *Strategic Comments*, Vol. 3, No. 9 (November 1997), IISS, London.

"The Politics of Legal Reform in Palestine," *Journal of Palestine Studies*, Vol. 27, No. 1 (Autumn 1997).

"Can Islamists Be Democrats? The Case of Jordan," *The Middle East Journal*, Vol. 51, No. 3 (Summer 1997).

"The Growing Authoritarianism of the Arafat Regime," *Survival; The IISS Quarterly*, Vol. 39, No. 2 (Summer 1997).

"Oslo, Three Years On," *Survival; The IISS Quarterly*, Vol. 38, No. 4 (Winter 1996-97).

"The Politics of Palestine," *Strategic Comments*, Vol. 2, No. 3 (12 April 1996). IISS, London.

"The Role of the Professional Middle Class in the Mobilization of Palestinian Society: The Medical and Agricultural Committees." *International Journal of Middle East Studies*, Vol. 25, No. 2 (May 1993).

Book Chapters and Encyclopedia Essays:

"Institution Building in Weak States: the Case of Palestine," in Mehran Kamrava, ed., *Weak States in the Greater Middle East*, forthcoming 2014.

"A Sociological Survey of the Middle East and North Africa," in Jack Goldstone, et al, eds., *Concise Encyclopedia of Comparative Sociology*, Leiden and Boston: Brill, forthcoming 2013.

"Iraq's Insurgencies in Comparative Perspective," in Amy L. Freedman, ed., Routledge, forthcoming 2013.

"The Palestinians" in Mark Gasiorowski, ed., *The Government and Politics of the Middle East and North Africa* (Seventh Edition). Boulder, CO: Westview Press, forthcoming 2013. Sixth Edition published in 2010, Fifth Edition published in 2007.

"Palestine" in Joel Kreiger, ed., *The Oxford Companion to Comparative Politics*, Oxford University Press, 2013.

"Identity Politics and the War in Iraq" in Heather S. Gregg, Hy S. Rothstein, and John Arquilla, eds., *The Three Circles of War; Understanding the Dynamics of Conflict in Iraq*. Washington, D.C.: Potomac Books, 2010.

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"Jihadi Information Strategy: Sources, Opportunities, and Vulnerabilities" in John Arquilla and Douglas Borer, eds., *Information Strategy and Warfare: A Guide to Theory and Practice*. New York and London: Routledge series on Contemporary Security Studies, 2007.

"Muslim Brotherhood", "West Bank", "Gaza Strip", " Hamas" and "Ahmad Qure'i" in the *World Book Encyclopedia* (Chicago: 2007). Print and on-line editions.

"Religion and Politics in Palestine" in Robert Wuthnow, ed. *Encyclopedia of Politics and Religion*, Second Edition. Washington, D.C.: CQ Press, 2006.

"The Al-Aqsa Intifada," "Why Oslo Failed," "Arab East Jerusalem," and "The First Palestinian Intifada, 1987-93" in David W. Lesch, ed., *History in Dispute: The Middle East Since 1945*, Volumes I and II. Columbia, S.C.: Manly, 2003 and 2004.

"Hamas as Social Movement" in Quinten Wiktorowicz, ed., *Social Movement Theory and Islamic Fundamentalism*, Indiana University Press, 2003.

"The Palestinian 'Intifada' Revolt" in Jack A. Goldstone, *Revolutions: Theoretical, Comparative and Historical Studies*. Thomson-Wadsworth, 3rd Edition, 2003.

"The Peace of the Powerful" in Roane Carey, ed., *The New Intifada; Resisting Israel's Apartheid*, Verso Press, 2001.

"Islamists under Liberalization in Jordan" in Ahmad S. Moussalli, ed., *Islamic Fundamentalism: Myths and Realities*, London: Ithaca Press, 1998.

"The Greater Middle East Co-Prosperity Sphere? The Arab-Israeli Problem and Gulf Security" in Jamal S. Al-Suwaida, ed., *Gulf Security in the 21st Century*, London: IB Tauris, 1997. Book simultaneously published in Abu Dhabi by the Emirates Center for Strategic Studies and Research, edited by David E. Long and Christian Koch.

"The Palestinians" in Peter Sluglett and Marion Farouk-Sluglett, eds., *The London Times Guide to the Middle East; The Arab World and its Neighbors*, London: Harper Collins, 1996.

Government Technical Reports (these proprietary reports need to be obtained from the appropriate USG agency and may not be distributed by the author)

Democracy, Human Rights and Governance in South Sudan (lead author). Submitted to the US Agency for International Development, March 2013. Fieldwork in South Sudan October-November 2012.

Jordan Rule of Law Assessment (co-author). Submitted to the US Agency for International Development, March 2011. Fieldwork in Jordan February 2011.

Report on Iran Futures Workshop (lead author). Department of Defense, September 2010.

Palestinian Tribes, Clans and Notable Families. Submitted to USG, July 2008.

Jordan Rule of Law Assessment (lead author). Submitted to the US Agency for International Development, February 2008. Fieldwork in Jordan December 2007.

Jordan Corruption Assessment (co-author). Submitted to the US Agency for International Development, September 2007. Fieldwork in Jordan August 2007.

Role of Civil Society in Building and Maintaining Civil Peace in the Palestinian Territories. Submitted to the US Agency for International Development, February 2007. Fieldwork in West Bank December 2006.

Yemen Corruption Assessment (lead author). Submitted to the US Agency for International Development, September 2006. Fieldwork in Yemen August 2006.

Evaluation of the Negotiations Support Unit, with Robert Springborg of the London Middle East Institute, report submitted to the UK Department for International Development, November 2004. Fieldwork in West Bank and Israel October 2004.

"Islamism, Jihadism and Terrorism", in David Tucker, ed., *Terrorism and Counter-Terrorism to 2015*, report submitted to Special Operations Command, September 2004.

Evaluation of the Community Services Program in the West Bank and Gaza Strip, final report submitted to the US Agency for International Development, March 2003.

Foundation for Decentralized Governance in West Bank and Gaza, Phase I, (co-author). Submitted to the US Agency for International Development, April 2000.

Tunisia 2010: A Defense Requirements Study. Submitted to the Defense Security Cooperation Agency in the Office of the Secretary of Defense, September 1999.

After the Peace: Elite Cohesion and Political Stability in Syria. Submitted to the Office of the Assistant Secretary of Defense, International Security Affairs, October 1996.

Judicial Administration Project in the West Bank and Gaza. Submitted to the Democratic Institutions Support Project and approved by the Global Bureau, Center for Governance and Democracy, US Agency for International Development, March 1996.

An Overview of Palestinian Institutional Capabilities and Development Requirements in the Health Care, Agricultural, Industrial and Educational Sectors of the West Bank and Gaza Strip. Prepared for the US Agency for International Development - Democratic Institutions Support Project, September 1, 1993.

Palestinian Institutional Configurations in the West Bank and Gaza under Four Autonomy Scenarios. Prepared for the US Agency for International Development - Democratic Institutions Support Project, May 18, 1993.

Other Publications:

My book reviews have been published in numerous journals, including the *International Journal of Middle East Studies*, *MESA Bulletin*, *Middle East Journal*, *Survival*, *Journal of Conflict Studies*, and *Review of Religious Research*. Recent published reviews include the following books:

Menachem Klein, *A Possible Peace between Israel and Palestine: An Insider's Account of the Geneva Initiative* (New York: Columbia University Press, 2007), review published in the *International Journal of Middle East Studies*, 41 (2009).

Beverly Milton-Edwards, *The Israeli-Palestinian Conflict: A People's War* (London and New York: Routledge, 2008), review published in the *Middle East Journal* 64:1 (Winter 2010).

Ron E. Hassner, *War on Sacred Grounds* (Ithaca: Cornell University Press, 2009). Reviewed in the *International Journal of Middle East Studies* 43 (November 2011).

* I have published a number of op/ed articles, including "The Right Way to Aid Palestinian Democracy," *The Washington Post*, September 26, 1993, and "A Window of Opportunity", *The Toronto Star*, November 12, 2004.

SELECTED CONFERENCE PAPERS AND LECTURES

Institutions in Weak States: the Case of Palestine. Presented at workshop on “Weak States in the Greater Middle East,” Doha, Qatar, December 2012.

The Political Economy of Corruption in Yemen. Presented at the Annual Conference of the Middle East Studies Association, Denver, November 2012.

The Arab Spring: Causes and Consequences. Presented at the US Army College, Arab Spring Regional Symposium, January 2012.

The Political Economy of Corruption in Yemen, presented at the annual Baker Peace Conference, “Failed States and Fragile Societies,” Ohio University, April 2011.

Whither a Vanguard? Internal Jihadi Strategic Arguments and Their Tactical Implications. Presented at the Annual Conference of the Middle East Studies Association, San Diego, November 2010.

Jihadi Information Strategy in conference on Rethinking Jihad: Ideas, Politics, and Conflict in the Arab World and Beyond, University of Edinburgh, Scotland, September 2009.

Twilight for the Two State Solution? Presentation at the Annual Conference of the Middle East Studies Association, Washington, D.C., November 2008.

Jihadi Information Strategy. Presentation to the Marshall Center for European Studies, Garmisch, Germany, June 2008.

Global Assessment of Islamist Militancy: Middle East. Paper presented to conference on Global Assessment of Islamist Militancy, Wilton Park, United Kingdom, June 2007.

Islamist Inclusion in Palestine and Jordan: The Triumph of Organizational Interests over Ideological Dogma. Talk given to the annual conference of the American Political Science Association, Philadelphia, PA, September 2006.

Iraq's Insurgency in Historical Comparative Perspective, Paper presented to the first annual conference of Office of Iraq Analysis, Washington DC, December 2004; second iteration presented at NPS, 2005.

Urban Planning and Refugee Absorption in Palestine, Paper presented at the annual conference of the Middle East Studies Association, San Francisco, CA, November 2004.

Democratization as Regime Retrenchment: the Case of Jordan, Paper presented to conference on "Islamic fundamentalism and Regime Retrenchment: the Middle East after the Iraq War", San Diego, September 2004.

Organizational Imperative and the Limits to Alliance, Paper presented at the European University Institute, Florence, Italy, March 2004.

Typologies of Islamist Networks, Paper presented at the annual conference of the Middle East Studies Association, Anchorage, AK, November 2003.

Hamas as Social Movement, Paper presented to graduate seminar, UCLA, April 2003.

Hamas, Presentation to workshop on Islamist Networks, Duke University, March 2003.

Beyond Hegemonic Peace, Paper presented to conference on "Dialogue Among Civilizations" at the University of Southern Denmark, Odense, Denmark, September 2002.

An Examination of Current Political Science Research on Palestine. Paper presented at the annual conference of the Middle East Studies Association, San Francisco, November 2001.

Hamas as Social Movement. Paper presented at the annual conference of the Middle East Studies Association, San Francisco, November 2001.

Decentralization in Rentier States: the Case of Palestine. Paper presented at the annual conference of the American Political Science Association, San Francisco, CA, September 2001.

The Political Economy of Succession Palestine. Paper presented at the annual conference of the American Political Science Association, San Francisco, CA, September 2001.

Decentralization in Rentier States: the Case of Palestine. Paper presented at the annual conference of the Middle East Studies Association, Orlando, FL, November 2000.

Legal Reform in Palestine. Paper presented at the annual meeting of the Law and Society Association, Miami, May 2000.

The Changing of the Arab Guard and the Peace Process. Annual Glickman Lecture, Lipinsky Institute for Judaic Studies, San Diego State University, May 2000

A Middle East Security Dilemma: Is Peace Compatible with Political Stability? Paper presented at the annual meeting of the Middle East Studies Association, San Francisco, November 1997.

The Politics of Power Consolidation in Palestine: The Law as Metaphor. Paper presented at the annual meeting of the Middle East Studies Association, Rhode Island, November 1996.

Can Islamists Be Democrats? The Case of Jordan. Paper presented at the American Political Science Association Annual Conference, San Francisco, August 1996.

The Greater Middle East Co-Prosperity Sphere? Paper presented at a conference on Gulf Security in the 21st Century, Emirates Center for Strategic Research and Studies, Abu Dhabi, United Arab Emirates, January 1996.

The Islamist Movements in Jordan and Palestine. Paper presented at the United States Institute of Peace, Washington, D.C., December 1994.

Dilemmas of States: Islamism, Liberalization and the Arab-Israeli 'End Game.' Paper presented at the Middle East Studies Association Annual Conference, Phoenix, Arizona, November 1994.

The New Middle Class Reconsidered: The Formation of Political Elites and the Palestinian Intifada. Paper presented at the Middle East Studies Association Annual Conference, Portland, October 1992.

The Islamist Movement in the West Bank and Gaza Strip. Paper presented in the lecture series on "The Moral Economy of Islamic Movements," Center for Middle Eastern Studies, University of California, Berkeley, October 1992.

To Free the Soul or Free the Nation? Class and Ideology in the Islamist Movement in Palestine. Paper presented at the American Political Science Association Annual Conference, Chicago, September 1992.

Class and Ideology in Palestinian Politics. Paper presented at a Workshop on "Society and Politics in Contemporary Jerusalem," Hebrew University of Jerusalem, June 1992.

Abu Barbur: Popular Committees, Elite Conflict, and Social Change in Bayt Sahur During the Palestinian Uprising. Paper presented at the Middle East Studies Association Annual Conference, Washington, D.C., November 1991.

I have given lectures at numerous universities, including Harvard University, McGill University, University of Kentucky, University of California at Berkeley, University of California at Davis, University of California at Los Angeles, Columbia University, University of Utah, University of North Carolina at Chapel Hill, University of Denver, San Diego State University, US Air Force Academy, US Army War College, Hebrew University of Jerusalem, University of Jordan, New Jordan Research Center (Amman), Koc University (Istanbul) and Bilkent University (Ankara).

LANGUAGES

Arabic: speaking, reading, writing.

Farsi: reading.

Spanish: reading.

TRAVEL

Middle East and North Africa: Algeria (1981); Egypt (1980-81, 1989, 1990, 2012); Iran (1978); Israel and the West Bank/Gaza (1981, 1984, 1985, 1986, 1989-90, 1992, 1994, 1995, 1999, 2002, 2004, 2006); Jordan (1984, 1985-86, 1994, 1996, 2007-twice, 2011, 2012); Lebanon (1981); Morocco (1981, 2006); Oman (2011, 2012, 2013); Qatar (2011, 2012); Saudi Arabia (2003); Syria (1981, 1984, 1985, 1986, 1996, 2005); Tunisia (1981, 1999); Turkey (1983, 1997, 1998, 2007); United Arab Emirates (1996, 2008, 2011, 2012, 2013); Yemen (2006).

Europe: Croatia (2007, 2010); Denmark (2002, 2008, 2011); Estonia (2008); Finland (2008); France (1981, 1989, 2010); Germany (1981, 2008); Greece (1983, 2007); Italy (1981, 2004, 2005, 2007, 2010, 2012); Malta (2012); Monaco (2010); Norway (2011); Spain (1981, 2010, 2012); Sweden (2008, 2011); Switzerland (1981); United Kingdom (1981, 1991, 2007, 2009); and Russia (2008).

Asia: Hong Kong (1990); India (1990, 2013); Japan (1980); Nepal (1990); Pakistan (1990); Philippines (1990); Thailand (1990).

Sub-Saharan Africa: Kenya (1986); South Africa (1986); South Sudan (2012); Tanzania (1986).

Oceania: New Zealand (2009), Polynesia (2009), Micronesia (2009), Melanesia (2009).

Americas: Canada (1977, 1987, 1993); Colombia (1979); Ecuador (1979); Mexico (1976, 2010).

COMMUNITY SERVICE

Volunteer Work. I am currently or have recently been on the Governing Boards of: the World Affairs Council on the Monterey Peninsula, LandWatch Monterey County, the Lyceum of Monterey County, the Carmel Valley Association, the Carmel Valley Land Use Advisory Committee, and the Carmel Valley Forum. I am a frequent lecturer to a variety of community groups. I am an ASA certified girls fastpitch softball coach.

Media. I have been interviewed on Middle East-related topics on the News Hour with Jim Lehrer, National Public Radio, KQED Public Television (San Francisco), KRON Television (San Francisco), KSBW Television (Monterey), KCBS Radio (San Francisco), and WKCR Radio (New York). I am a frequent contributor to KCBS radio. I have written op/ed pieces for a number of newspapers, including *The Washington Post*, *The San Francisco Chronicle*, and *The Toronto Star*.

GOVERNMENT SERVICE

Agency for International Development, 2012-2013. Led an 11-member team to South Sudan to conduct a DRG assessment (democracy, human rights and governance). Report submitted to USAID February 2013.

Agency for International Development, 2011. Member of four-person team to Jordan to conduct updated rule of law assessment. Report submitted March 2011.

Agency for International Development, 2007-2008. Led a three-person team to Jordan which evaluated current USAID rule of law programs in Jordan, and assessed future avenues for potential investment in the rule of law. Report submitted February 2008.

Agency for International Development, 2007. Evaluated the state of corruption in Jordan, including three weeks of fieldwork in Jordan in August 2007. Report submitted in September 2007.

Agency for International Development, 2006-2007. Team leader for Civil Peace assessment in West Bank/Gaza, including two weeks of fieldwork in December 2006. Report submitted March 2007.

Agency for International Development, 2006. Team leader for assessment of corruption in Yemen. Included three weeks of fieldwork in Yemen in August 2006 interviewing government ministers, parliamentarians, and other officials. Chief author of 206-page assessment.

US Central Command, 2005-present. Appointed to inaugural Board of Experts to advise CENTCOM on various aspects of Middle East politics.

Regional Security Education Program, 2005-present. Periodic guest on US aircraft carrier groups providing educational services to the fleet.

Department for International Development (DFID – United Kingdom), 2004. Evaluated the Negotiations Support Unit of the PLO's Negotiations Department. Evaluation included three weeks of field work in the West Bank in October 2004. Draft report submitted in November 2004, and final report submitted December 2004.

Agency for International Development, 2002-2003. I evaluated the Community Services Program, USAID's flagship program in the West Bank and Gaza Strip. Evaluation included 4 weeks of field work in the West Bank and Gaza Strip in August 2003. Draft report submitted October 2002, final report submitted March 2003.

Agency for International Development, 1999-2000. I was part of a team working on an USAID project to enhance Palestinian local governance capacity and effectiveness in the West Bank and Gaza. Fieldwork was undertaken for three weeks in 1999. Final report was presented to USAID in April 2000.

Department of Defense, 1999. I led a six-person team comprised of NPS students to Tunisia for three weeks in March 1999 in order to research and write a Defense Requirements Study for Tunisia. The \$70,000 project is funded by the US Defense Security and Cooperation Agency of the Department of Defense.

Department of Defense, 1998. Research project on how new information technologies are changing the face of opposition politics in the Middle East, with particular attention paid to the Gulf. Working paper entitled *Islam and Info-resistance in the Gulf*. Project funded as part of a \$140,000 grant.

Department of Defense, 1995-96. Conducted research in Jordan and Syria examining the impact of the peace process on the political stability of the Ba'thist regime in Syria. The report, *After the Peace: Elite Cohesion and Political Stability in Syria*, was submitted to the Office of the Assistant Secretary of Defense, International Security Affairs, October 1996. Project funded by a \$70,000 grant.

Agency for International Development, 1995. Chief of Party for five-person, three-month, \$229,000 USAID project in judicial administration in the Palestinian legal sector. Undertaken through USAID's Democratic Institutions Support Project, the program was the first by any donor country in the legal sector, and represented a test project in the structural and political receptivity of the Palestinian legal sector to external development assistance. The March 1996 project report became the basis for USAID policy toward this sector during the period 1996-2000.

Agency for International Development, 1993. I prepared two studies for USAID, which identified relevant Palestinian development-oriented institutions in the West Bank and Gaza and examined how different self-rule scenarios would impact these institutions.

PROFESSIONAL SERVICE

Middle East Studies Association (MESA), 1991-present

- Founding Treasurer and Board Member, Association of Gulf and Arabian Peninsula Studies, 2012-present
- Chair, Malcolm H Kerr Award Committee for the best social science dissertation, 2009. Committee Member, 2008.
- Nominating Committee member for 2007-2008 MESA President and Board.
- Associate Editor, *MESA Bulletin* (1997-2003).
- Member, Committee on Academic Freedom in the Middle East and North Africa (CAF MENA, 1999-2005)
- 2003, 2010 Annual Conference Program Committee
- Book Reviewer, *MESA Bulletin*
- Book Reviewer, *International Journal of Middle East Studies*

Founding Board Member and Treasurer, Association for Gulf and Arabian Peninsula Studies (AGAPS), 2012-present

Member, American Political Science Association (APSA), 1991-present

Editorial Board, *Foreign Policy Bulletin; The Documentary Record of United States Foreign Policy*, 2009-2013.

Editorial Board, *Digest of Middle East Studies*, 2012-present

Manuscript Reviewer: *Oxford University Press, Cambridge University Press, University of California Press, Princeton University Press, SUNY Press, Middle East Journal, International Journal of Middle East Studies, PSQ - Political Science Quarterly, Comparative Political Studies, Comparative Politics, Mobilization: An International Journal, Palgrave Press, University Press of Florida, The Nonproliferation Review, Naval Institute Press, Nations and Nationalism, US Institute of Peace.*

Application Reviewer, United States Institute of Peace

EXHIBIT B

EXHIBIT B

No.	Document	Date of Document
1.	Expert Reports and associated materials of Addicott, Karsh, Levitt and Marcus (as produced by plaintiffs)	
2.	Expert Reports of Shaked, Shrenzel & Kaufman (as produced by plaintiffs)	
3.	Corrected copy of Shaked report and CV of Kaufman (as produced by plaintiffs)	
4.	Expert Reports of Spitzzen, Marcus, Reisner, Karsh and Levitt (as produced by plaintiffs)	
5.	Expert Report of Alon Eviatar (as produced by plaintiffs)	6/14/2013
6.	Translation of "Les Textes: Quelle Authenticité?," by Jean-François Legrain (original French available at: http://www.mom.fr/guides/aqsa/aqsa025.htm)	7/17/2004
7.	"Israel fires back as violence flares," Breaking News From globeandmail.com.	5/18/2001
8.	"Israeli Army's Mistakes Draw Widespread Criticism," Philadelphia Inquirer (May 24, 2001)	5/24/2001
9.	"Third Submission of the Palestine Liberation Organization to the Sharm El-Sheikh Fact-Finding Committee," available at: http://web.archive.org/web/20030508155803/http://www.nad-plo.org/eye/Executive%20Summary.pdf (Executive Summary)	4/3/2001
10.	"A Crisis of Faith: Second Submission of the Palestine Liberation Organization to the Sharm El Sheikh Fact-Finding Committee," available at: http://web.archive.org/web/20030508111214/http://www.nad-plo.org/eye/A%20crisis%20of%20faith.pdf	12/30/2000
11.	"Third Submission of the Palestine Liberation Organization to the Sharm El-Sheikh Fact-Finding Committee," available at: http://web.archive.org/web/20040325082226/http://www.nad-plo.org/textbooks/third_sub.pdf (Excerpts on Incitement)	4/3/2001

12.	"Preliminary Submission of the Palestine Liberation Organization to the International Commission of Inquiry," available at: http://web.archive.org/web/20030508193800/http://www.nad-plo.org/eye/inception%20report.final.pdf	12/8/2000
13.	"The Sharm El-Sheikh Fact-Finding Committee," Senator George J. Mitchell, available at: http://web.archive.org/web/20021220190120/http://www.nad-plo.org/eye/news36.html	5/15/2001
14.	"QUESTION OF THE VIOLATION OF HUMAN RIGHTS IN THE OCCUPIED ARAB TERRITORIES, INCLUDING PALESTINE," Report of the human rights inquiry commission established pursuant to Commission resolution S-5/1 of 19 October 2000, available at: http://unispal.un.org/UNISPAL.NSF/0/4A5FCB3241D55A7885256A1E006E75AD	3/16/2001
15.	"Rule of Law Development in the West Bank and Gaza Strip: Survey and State of the Development Effort," UN, Office of the Special Coordinator in the Occupied Territories, available at: http://domino.un.org/unispal.nsf/db942872b9ae454852560f6005a76fb/7968e954038f503785256b1f0058556f?OpenDocument	5/31/1999
16.	"Mideast braces for more bloodshed," Toronto Star, January 19, 2002	1/19/2002
17.	"Palestinians arrest militants after spree of anti-Israeli attacks kills 25," The Associated Press, December 2, 2001	12/2/2001
18.	PHYSICAL DAMAGES INFLICTED BY IDF ATTACKS TO EU FUNDED DEVELOPMENT PROJECTS (Chart), available at: http://thecepr.org/images/stories/pdf/idf%20damages%20to%20eu%20funded%20projects.pdf	Undated
19.	Time Line of Second (Al-Aqsa) Intifada, Chronology of Intifada events since 2000, The Middle East, available at: http://mideastweb.org/second_intifada_timeline.htm	11/2/2008
20.	"Palestinian-Israeli Security Implementation Work Plan," Tenet cease-fire plan (as published in Ha'aretz, June 14, 2001), available at: http://unispal.un.org/unispal.nsf/eed216406b50bf6485256ce10072f637/798c5b335068ebba85256cf00075cb6e?OpenDocument	6/14/2001

21.	"SECRETARY-GENERAL WELCOMES SPEECH BY US SECRETARY OF STATE AS 'IMPORTANT ELABORATION OF PRESIDENT BUSH'S CONSTRUCTIVE REMARKS' ON MIDDLE EAST," Secretary General, available at: http://unispal.un.org/unispal.nsf/eed216406b50bf6485256ce10072f637/9f8f827973c828ac85256b0a00526d33?OpenDocument	11/19/2001
22.	"Secretary General Expresses Hope that Latest Mideast Violence Will Not Deter Parties from Seeking Political Solution," UN Press Release, available at: http://unispal.un.org/unispal.nsf/eed216406b50bf6485256ce10072f637/83467275015e057485256b83005302aa?OpenDocument	3/20/2002
23.	"Question of the Violation of Human Right in the Occupied Arab Territories, Including Palestine: Report of the Special Rapporteur of the Commission on Human Rights, Mr. John Dugard, on the situation of human rights in the Palestinian territories occupied by Israel since 1967, submitted in accordance with Commission resolutions 1993/2 A and 2002/8," UN Report, available at: http://unispal.un.org/unispal.nsf/9a798adb322aff38525617b006d88d7/7900b2bacd4290ca85256cbd0055c599?OpenDocument&Highlight=0_E%2FCN.4%2F2002%2F32	12/17/2002
24.	<i>Storm Clouds on the Horizon of Darwinism: Teaching the Anthropoc Principle and Intelligent Design in the Public Schools</i> , Jeffrey F. Addicott (Ohio Law Journal, Vol. 63:1507 (2002))	2002
25.	Recording of radio appearance found here: http://www.youtube.com/watch?v=APetVTKmnWE	
26.	Recording of radio appearance found here: http://www.youtube.com/watch?v=Nf7en6LsJo4	
27.	Video of lecture found here: http://www.youtube.com/watch?v=a5pPd3VIWvA	

28.	<p>“Perceptions and the Law” by Addicott and his Terrorism law center. A complete collection of the videos can be found here: http://www.youtube.com/watch?v=ofOoY8BoIEg&list=PL89628A73C10C409F</p> <p>SENT:</p> <ul style="list-style-type: none"> a. What is Terrorism (episode 2) b. Types of Terrorism (episode 3) c. Interrogation and Torture (episode 12) d. UN, NATO and the War on Terror (episode 13) e. Terrorism Avoidance (episode 19) 	
29.	<i>Why is Paris Burning: Two new books fan the flames of the European-Muslim conflict</i> , by Sarah Wildman (Review of <i>Islamic Imperialism: A History</i> , by Efraim Karsh) (Issue #1, Summer 2006)	2006
30.	<i>Peace Not Love: Toward a Comprehensive Arab-Israeli Settlement</i> , by Efraim Karsh in the <i>Washington Quarterly</i> in 1994	1994
31.	<i>A Cooperative Approach to Arab-Israel Security</i> , by Efraim Karsh and Yezid Sayigh published in the <i>Routledge Journal, Survival: Global Politics and Strategy</i> , 1994	1994
32.	The <i>Guardian</i> newspaper (London), the June 16, 2007 Review: Paperbacks: Non-Fiction: <i>Islamic Imperialism: A History</i> , by Efraim Karsh (review by Ian Pindar)	June 16, 2007
33.	Column by Efraim Karsh in the May 25, 1994 edition of the <i>Los Angeles Times</i> : “Arafat’s Skill as a Crafty Fox is Inadequate to the Tasks of Nationhood”	May 25, 1994
34.	<i>Palestine Betrayed – Book Review</i> , by George Polley, <i>The Palestine Chronicle</i> , January 3, 2011	January 3, 2011
35.	<i>Two Biographies Explore the life of Yasser Arafat, But Neither Pierces the Darkness</i> , by Yossi Alpher, in <i>Forward</i> , March 5, 2004	March 5, 2004
36.	Guest column by Efraim Karsh “U.S. Had No Option in Dealing with Saddam” the April 8, 2003 edition of the <i>Los Angeles Times</i>	April 8, 2003
37.	“Don’t Make Israel the First Casualty” by Efraim Karsh in <i>The Spectator</i> , November 3, 2001	November 3, 2001

38.	<i>Hamas's Ideological Crisis</i> , by Matthew Levitt, Current Trends in Islamist Ideology, Vol. 9 (Nov. 6, 2009)	11/6/2009
39.	Akiva Eldar, <i>Military Intelligence: Never expected Hamas victory in 2006</i> , Ha'aretz, September 1, 2009	9/1/2009
40.	B'Tselem, Operation Defensive Shield, Soldiers' Testimonies/Palestinian Testimonies, http://www.btselem.org/sites/default/files2/publication/200207_defensive_shield_eng.pdf	-
41.	Youtube Video (CD) regarding Israeli Army, http://www.youtube.com/watch?v=IDCq8tKxAHs	-
42.	<i>Middle East: Israel's Black Propaganda Bid Falters as Documents Reveal an Impotent Leader Not a Terrorist Mastermind; Israel's "Book of Terror" Purporting to Show Arafat's Role in Suicide Attacks is 'Riddled with Omissions and Falsehoods,'</i> by Robert Fisk, May 9, 2002, The Independent (London)	5/9/2002
43.	<i>Undermining Hamas and Empowering Moderates by Filling the Humanitarian Void</i> , by Matthew Levitt & Jamie Chosak, September 7, 2005	9/7/2005
44.	"Jenin: The Capital of the Palestinian Suicide Terrorists," IDF/MI Report	4/18/2002
45.	"The 'Al Aqsa Martyrs Brigades' (on US State Department list of terror organizations) and the Fatah Organization are one and the same, and Yasser Arafat is their leader and commander," IDF/Military Intelligence report	5/3/2002
46.	"Arafat's and the PA's Involvement in Terrorism (According to Captured Documents)," IDF Report	4/22/2002
47.	"The Palestinian Authority Employs Fatah Activists Involved in Terrorism and Suicide Attacks," IDF Report	4/23/2002
48.	"The Involvement of Arafat, PA Senior Officials and Apparatuses in Terrorism against Israel and Corruption," prepared by a team headed by Danny Naveh, Israeli Ministry of Parliamentary Affairs	5/2002
49.	Israel Defense Forces, "the Fatah and the PA Security Apparatuses in the Jenin Area Closely Cooperate with PIJ and Hamas"	4/9/2002
50.	"Suicide Bombing Terrorism During the Current Israeli-Palestinian Confrontation," Intelligence and Terrorism Information Center	

51.	"Palestinian Authority Captured Documents: Main Implications," IDF/MI report	4/7/2002
52.	"Appendix D: Financing of Fatah/Tanzim and Al Aqsa Brigades Infrastructures and Activities by Arafat and his Aides (Summary of Captured Documents)," IDF report	4/7/2002
53.	"A Captured Document Showing that in Bethlehem the Fatah (under Its Various Names) and the PA Intelligence Apparatuses Maintain a Regime of Oppression Based on Intimidation, Extortion, Unwarranted Arrests and Abuse of the Local Christian Population," IDF Report	4/14/2002
54.	"International Financial Aid to the Palestinian Authority Redirected to Terrorist Elements," Israel Defense Forces/Military Intelligence	6/2002
55.	"Results of questioning of Palestinian detainees (Communicated by the IDF Spokesman)," Israel Ministry of Foreign Affairs," 10 April 2002.	4/10/2002
56.	"Statement of Indictment: Nasser (Bin Mohammed Yusuf) Naji Abu-Hamid," Israel Ministry of Foreign Affairs	7/19/2002
57.	"Jenin: The Capital of the Palestinian Suicide Terrorists," IDF/MI Report	4/18/2002
58.	02:006779-80	4/13/2002
59.	02:005455-57	--
60.	02:008479-83	2/3/2002
61.	02:008336-38	6/2/2001
62.	02:006410	6/19/2002
63.	02:006785	6/19/2002
64.	00:008340-42	10/2/2001
65.	02:008343-47	10/4/2001

66.	02:008348-50	10/17/2001
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EXHIBIT C

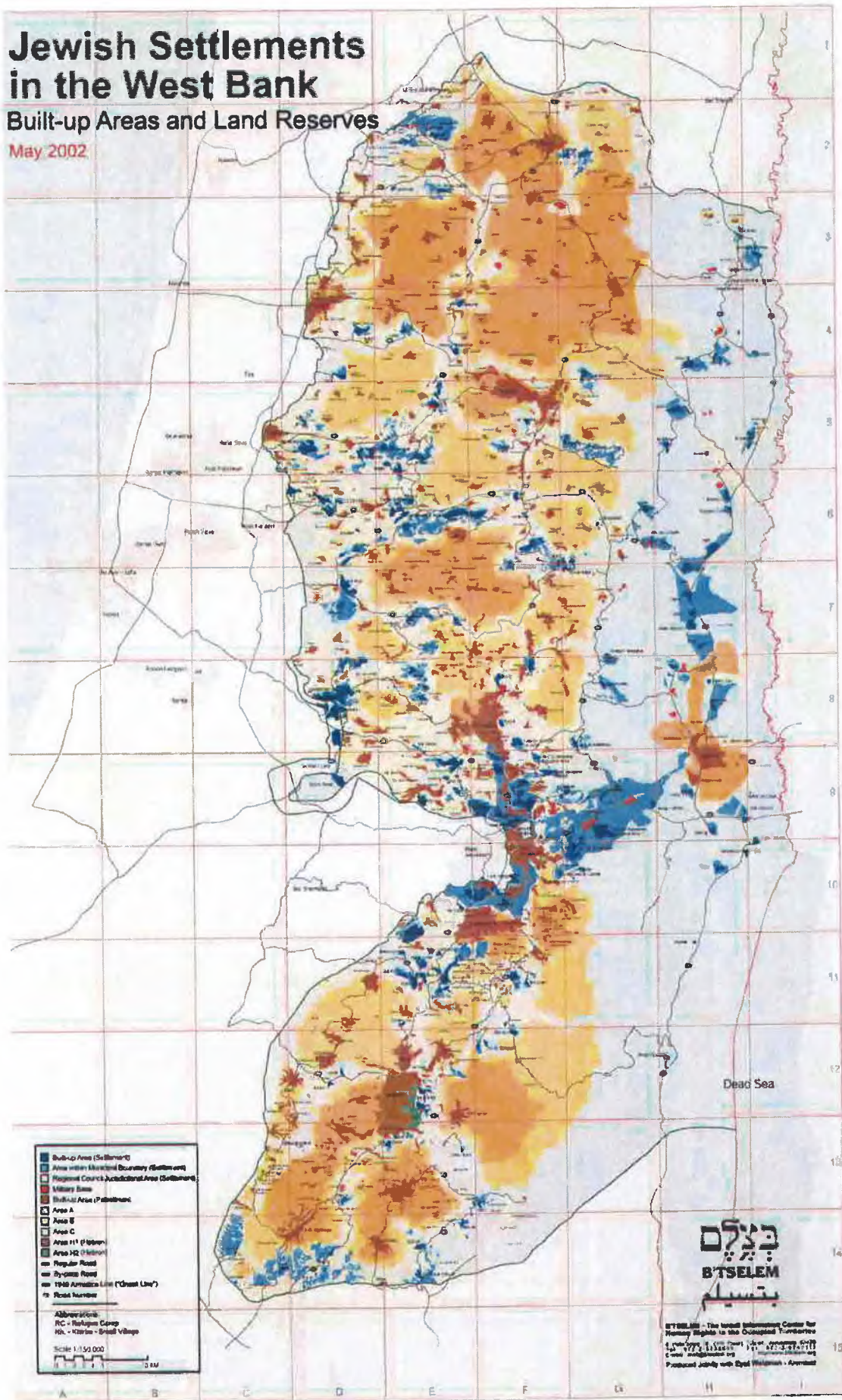


EXHIBIT D

The Forbidden Roads Regime

West Bank

August 2004

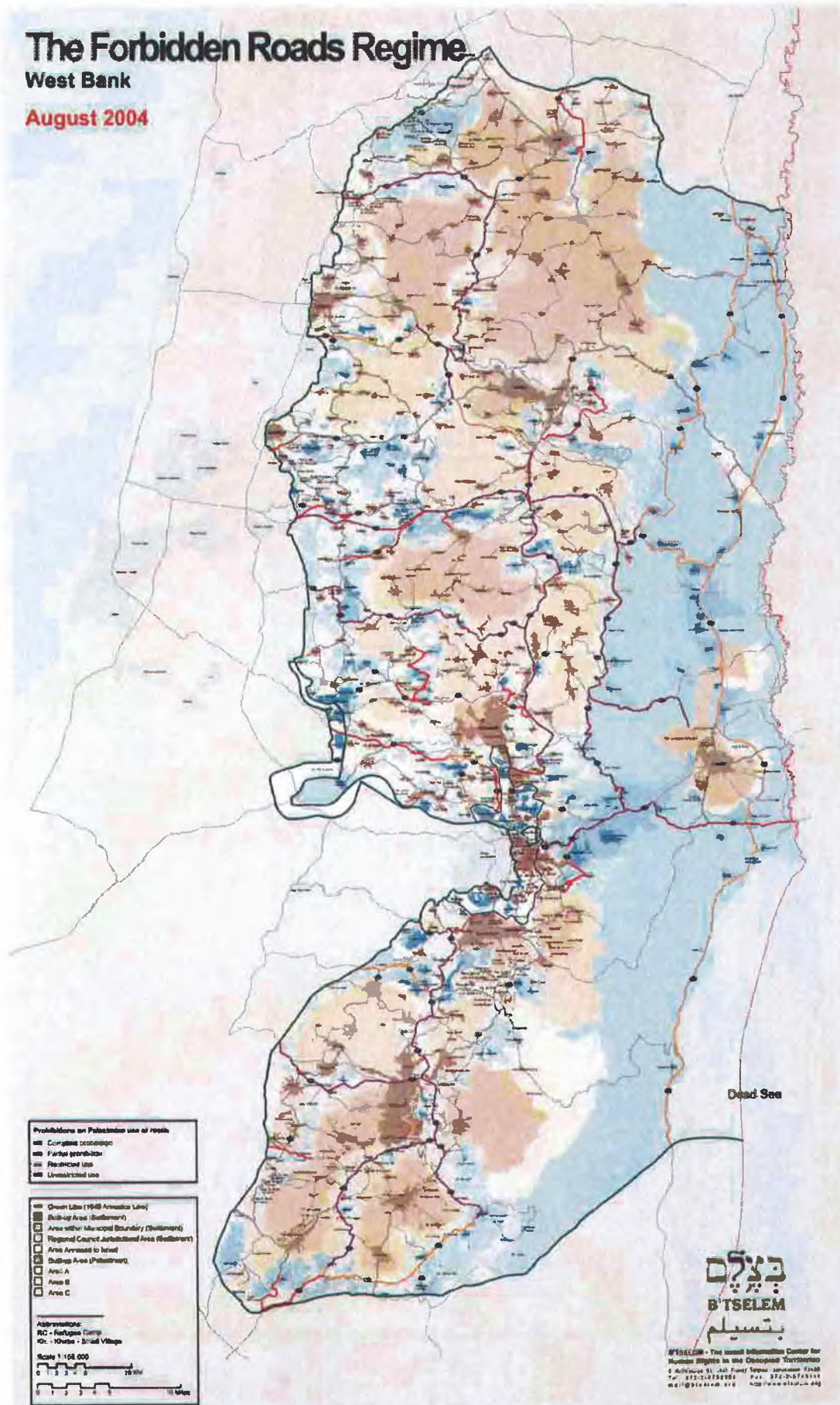


EXHIBIT E

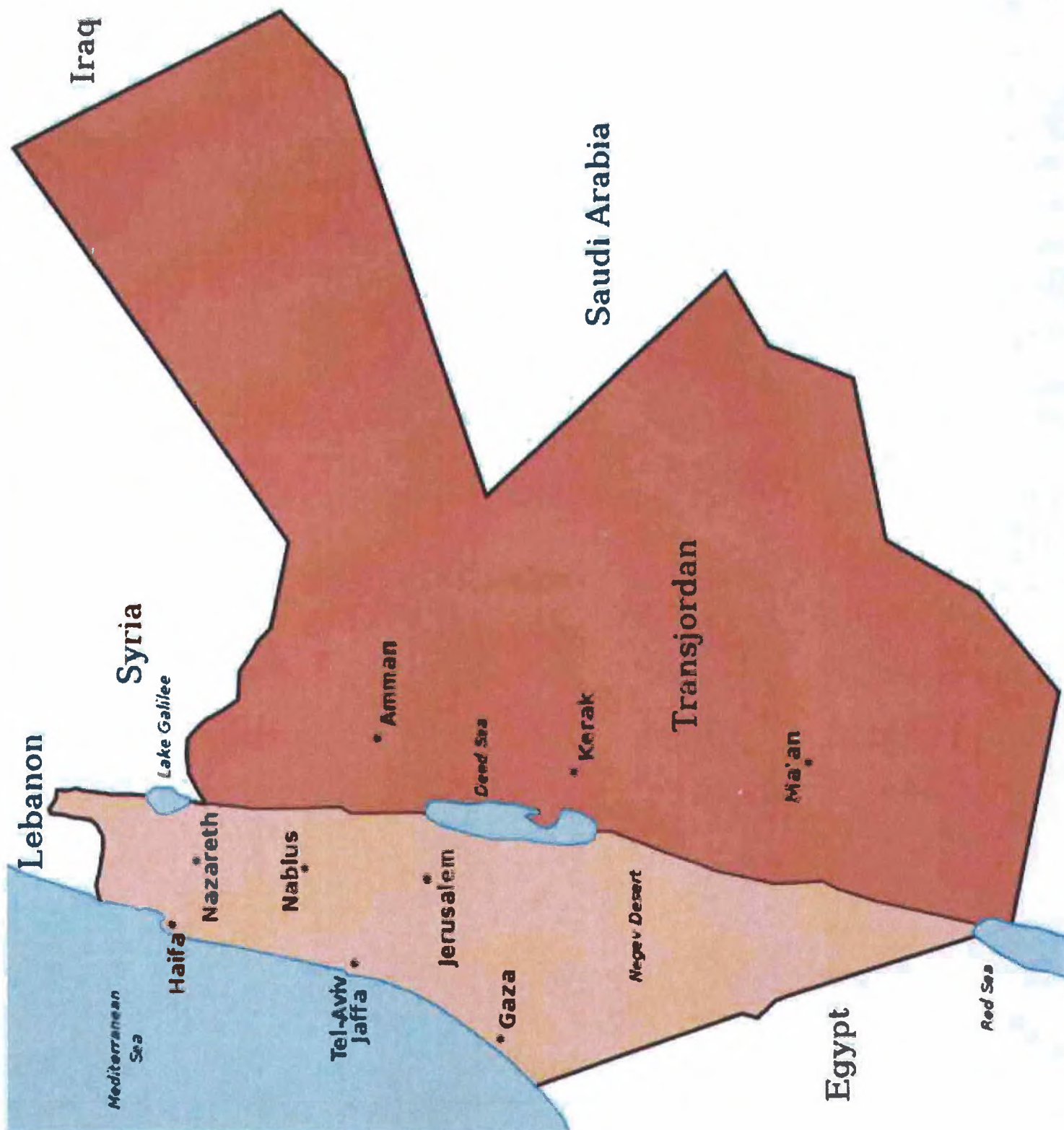
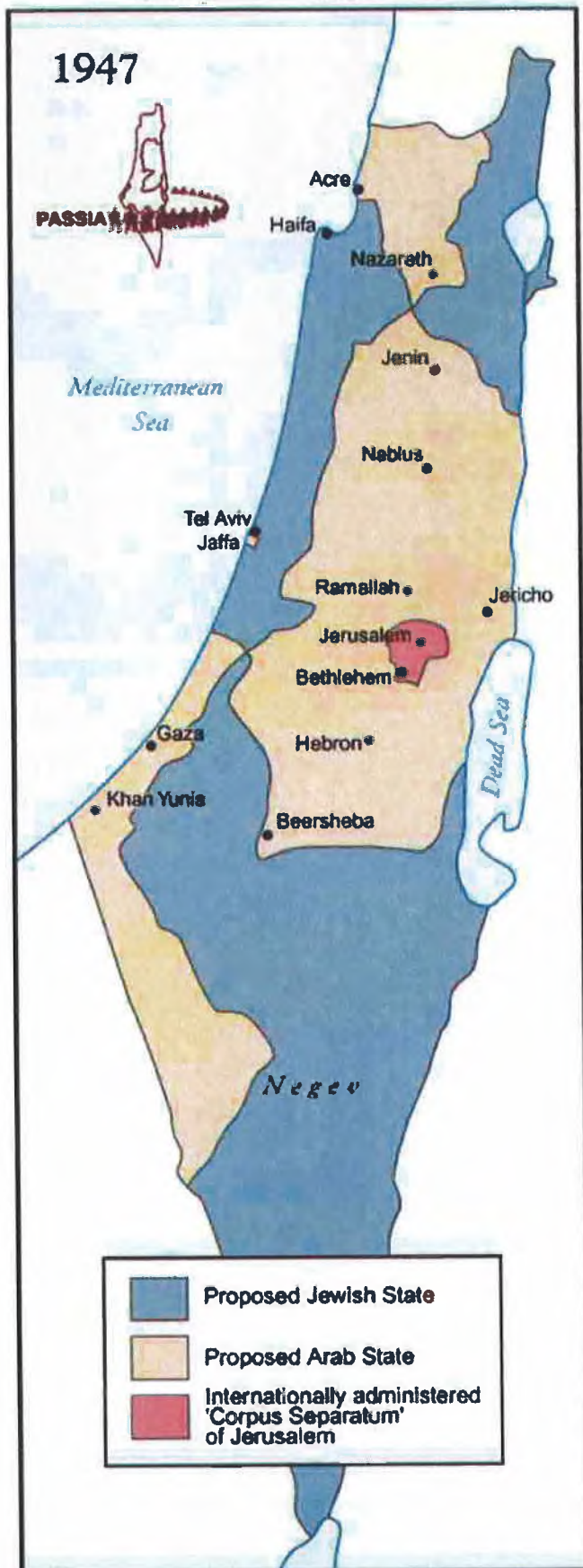


EXHIBIT F

United Nations Partition Plan UN Resolution 181



Rhodes Armistice Line

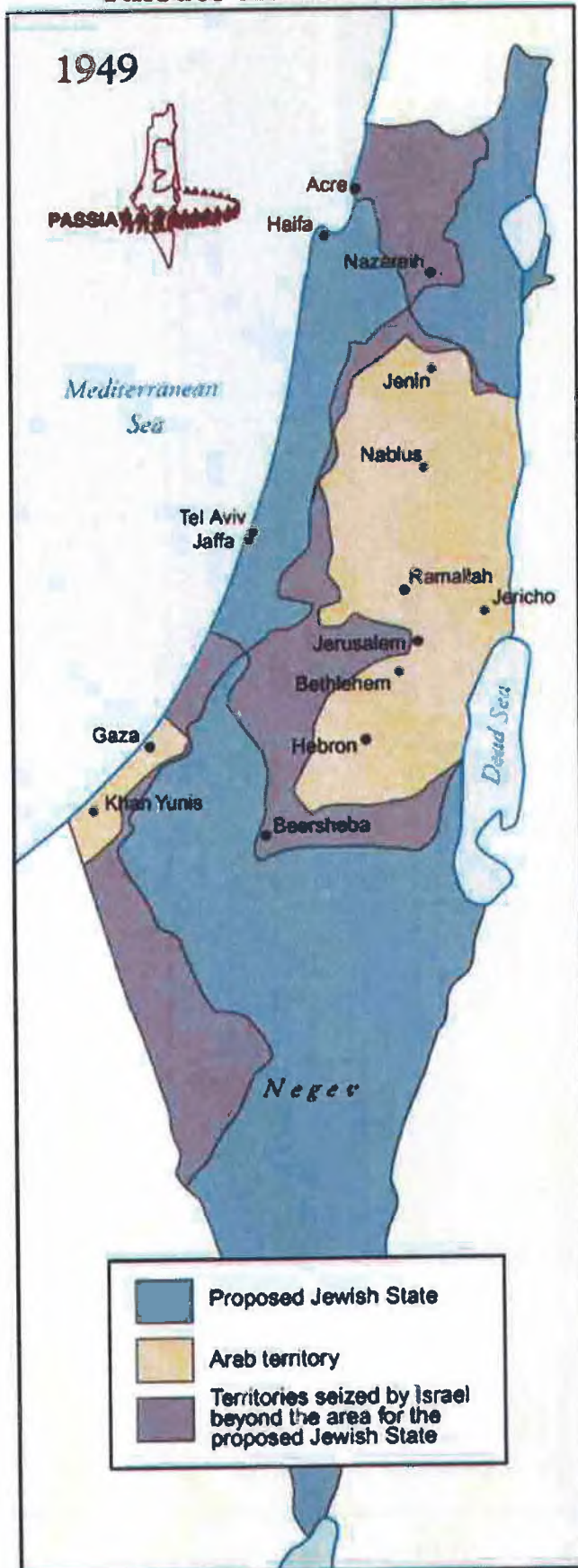
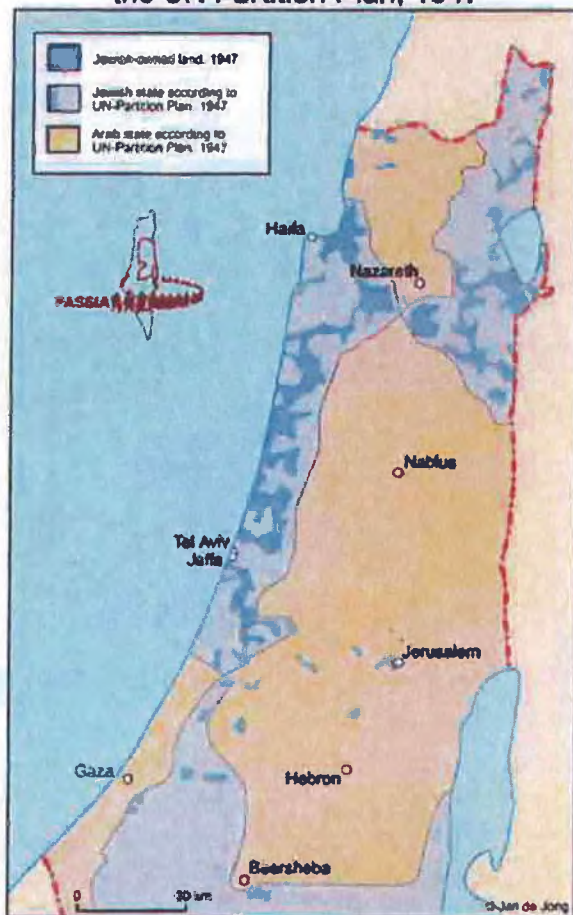
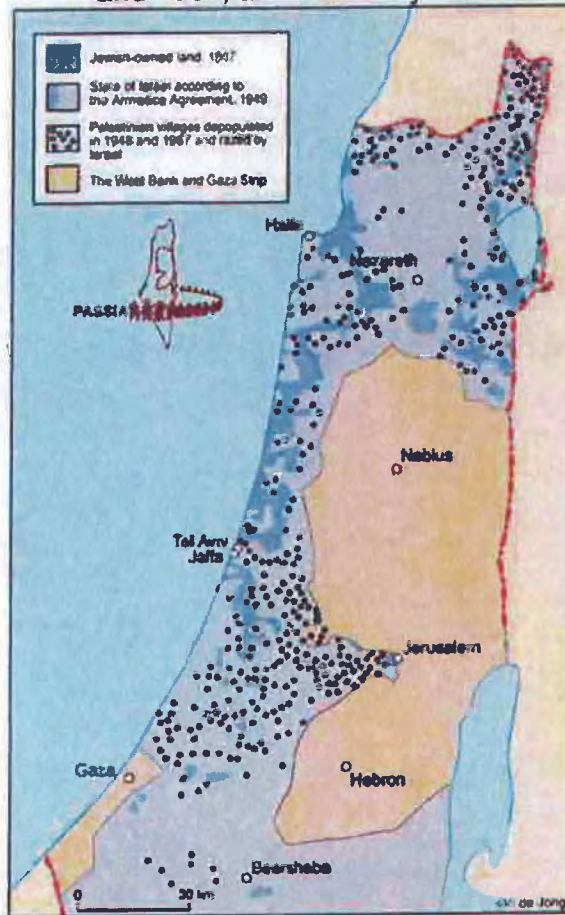


EXHIBIT G

**Landownership in Palestine and
the UN Partition Plan, 1947**



**Palestinian Villages Depopulated in 1948
and 1967, and Razed by Israel**



**Palestinian Academic Society for the Study of International Affairs
(PASSIA)**

EXHIBIT H

The Near East after the 1967 June War



EXHIBIT I

Oslo II, 1995

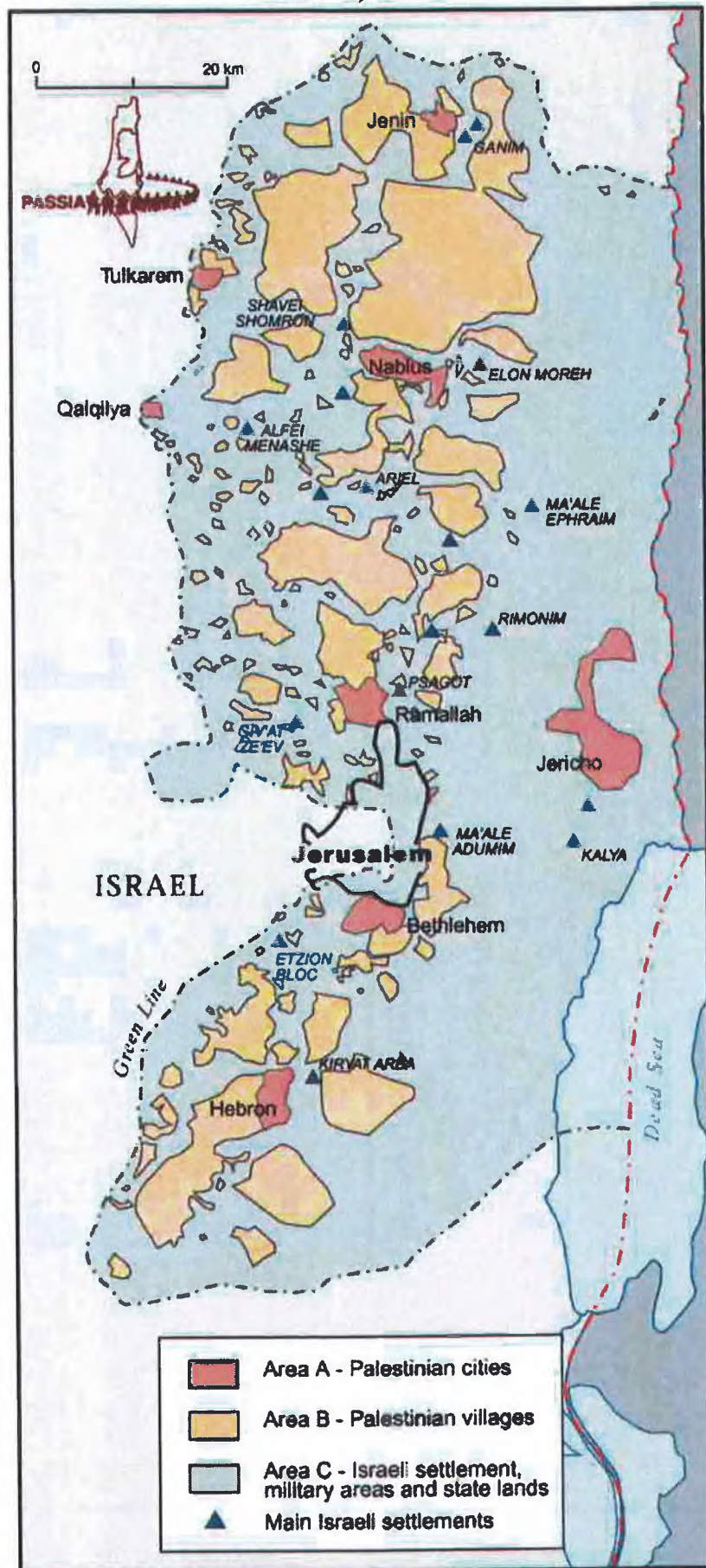


EXHIBIT J

Timeline: 1993 -- 2004

